

## UNITED STATES DISTRICT COURT

for the  
Southern District of OhioFILED  
RICHARD W. NAGEL  
CLERK OF COURT

7/14/23

United States of America  
v.

Luis Flores a/k/a Stevan Garcia

Case No.

3:23-mj-293

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
WEST. DIV. DAYTON

---

Defendant(s)

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/14/2023 in the county of Montgomery in the  
Southern District of Ohio, the defendant(s) violated:*Code Section*

21 USC s. 846 and 841(a)(1)(A)

*Offense Description*attempt to distribute 400 grams or more of a mixture or substance containing  
a detectable amount of fentanyl, a Schedule II controlled substance

This criminal complaint is based on these facts:

See Attached Affidavit of Connor Palmateer

☒ Continued on the attached sheet.Connor Palmateer  
Complainant's signatureConnor Palmateer, SA of the DEA  
Printed name and title

Sworn to by reliable electronic means -- namely, telephone.

Date: July 14, 2023City and state: Dayton, OhioCaroline H. Gentry  
United States Magistrate Judge

AFFIDAVIT

I, Connor W. Palmateer, having been duly sworn, do hereby state and depose as follows:

1. I am a Special Agent (“SA”) of the Drug Enforcement Administration (“DEA”), assigned to the Dayton Resident Office (DRO). I therefore am an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 21 U.S.C. § 878. Moreover, I am an “investigative law enforcement officer” within the meaning of 18 U.S.C. § 2510.

2. I have been employed by the DEA since January 2022, currently assigned to the Dayton Resident Office (DRO). I attended a 17-week Basic Training Academy at the DEA Training Academy in Quantico, Virginia. I attended multiple trainings at the DEA Training Academy, including but not limited to, narcotics identification, surveillance techniques, methods of operation of narcotics traffickers, evidence handling, undercover operations, current trends/patterns involving the distribution of narcotics, as well as other areas of drug enforcement. Through training and experience, and the experience of other agents involved in this investigation, I am familiar with the manner in which people involved in the illicit distribution of controlled substances often operate. These people usually attempt to conceal their identities, as well as the locations at which they reside, where they store controlled substances, and where they store the illegal proceeds derived therefrom. Through training and experience and the experience of other agents involved, I am familiar with the practices of narcotics distributors, whereby they attempt to conceal the true nature, source and location of proceeds of illegal activity, commonly referred to as money laundering. I am also familiar with the practices of drug traffickers in the use of motor vehicles to transport illegal drugs. I know that these drug traffickers commonly transport illegal drugs in their motor vehicles and conduct drug deals in their motor vehicles. The

facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

**I.**

**PURPOSE OF AFFIDAVIT**

4. I make this affidavit in support of a criminal complaint against, and arrest warrant for, as there is probable cause to believe that Luis Flores also known as Stevan Garcia knowingly and intentionally attempted to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, Sections 846 and 841(b)(1)(A).

**II.**

**PROBABLE CAUSE**

5. During On July 11, 2023, DEA SA William Czopek performed surveillance at a UPS store in, Phoenix, Arizona. SA Czopek knew this location based on previous parcel interdictions that led to the seizure of bulk amounts of drugs that individuals had attempted to send across the United States via UPS. That day, he saw a Hispanic male (later identified as Luis Flores also known as “Stevan Garcia”) enter the UPS store with a medium-sized box (SUBJECT PARCEL #1). A few minutes later, Flores exited the UPS store without the parcel,

entered a car and left the parking lot. DEA attempted to surveil Flores' car, but he drove erratically, changing lanes and hitting excessive speeds. Based on training and experience, I know that drug traffickers often drive in an erratic manner to evade law enforcement surveillance. DEA ended its efforts to follow Flores given how he was driving.

6. DEA spoke the USP store in Arizona, and it voluntarily provided information concerning SUBJECT PARCEL #1. Weighing eight pounds, Flores had sent the parcel via UPS 2nd Day Air to Axel Santino, 304 Ferry St, Apt 2, Everett, MA 02149 from Steven Garcia, 701 W Mitchell Dr, Phoenix, Arizona 85007. Flores had listed a phone number with the parcel – namely, 602-581-9132 (Target Telephone) and paid \$159.64 in cash to send its purported contents – an alleged PS5 gaming system. Given the cost of shipping the purported gaming system and that law enforcement databases found no 701 W Mitchell in Phoenix, DEA believed that the package contained contraband.

7. DEA performed research at other USP stores in the Phoenix area and learned that multiple parcels had been from the Phoenix area to other locations throughout the United States, listing the sender as Garcia with the Target Telephone number. DEA in Arizona ultimately obtained state search warrants for two of these parcels, executed those warrants and discovered within them over 3 kilograms of fentanyl bound for areas in the eastern United States.

8. DEA Arizona alerted DEA Dayton that one additional parcel with the Garcia and Target Telephone combination had been shipped to a Havard Johnson at an address in Dayton, Ohio. Law enforcement databases indicated that no one named Havard Johnson lived at the address on the parcel. The Johnson parcel ultimately arrived at a Dayton, Ohio UPS facility. A certified and trained drug alerted on the package, and the DEA sought and received a federal

warrant to open the package. Upon executing that warrant, DEA discovered within it roughly one kilogram of fentanyl.

9. Meanwhile, DEA Arizona sought and obtained a warrant to monitor the location of the Target Telephone. During July 14, 2023, that warrant placed the Target Telephone in the Dayton, Ohio area. DEA Dayton went to the location of the warrant information for the Target Telephone – a local motel near Miller Lane, a known drug trafficking area – and soon observed Flores travelling in concert with the phone’s location information. (An image from the parcel sender in Arizona matched Flores in Dayton, Ohio). Flores stayed at the motel, periodically walking on foot to a gas station a short distance away. Based on my training and experience, I know that drug traffickers will often send drug parcels and then travel to the recipient destination to collect the proceeds from the sale. Flores activities proved consistent with that activity.

10. On the afternoon of July 14, 2023, DEA agents approached Flores and advised him that they believed that he was engaged in drug trafficking activity. (Out of an abundance of caution, DEA Mirandized Flores). Flores admitted that he had come to the Dayton, Ohio area to collect money from drugs that he had sent to this area.

11. Based on the foregoing, I believe that there is probable cause to issue the above requested complaint and arrest warrant.

Respectfully submitted,

*Connor Palmateer*

---

Connor W. Palmateer  
Special Agent  
Drug Enforcement Administration

Subscribed and sworn to before me on this \_\_\_\_th day of July 14., 2023

  
\_\_\_\_\_  
Caroline H. Gentry  
United States Magistrate Judge

